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**VIA ECF ONLY**

Hon. James R. Cho  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re: *Karnes et al., v. City of New York et al.*, 21-CV-4903 (E.D.N.Y.)**

You Honor:

As the Court is aware, we represent Plaintiffs in the above-captioned matter. We write at the Court's direction along with the defendants to suggest the following schedule to conclude discovery for Ms. Washam.

Supplemental Discovery Demands:	July 7, 2025
Close of Discovery (fact and expert):	November 7, 2025

The reason for the longer time period to make supplemental discovery demands is that plaintiffs intend to make specific demands to fill out the gaps in the *Sow v. City of New York et al.*, discovery. To do that, it requires a near complete discovery review of the documents and depositions exchanged in that action. As Your Honor may recall that action produced dozens of depositions, thousands of pages of documents, and many many hours of videos related to the George Floyd Protests.

Additionally, we built out the schedule to account for counsels' vacation and trials. We

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are optimistic this schedule will not require modification, and we can present a trial ready case for Your Honor this fall. The parties are continuing to discuss settlement and will not hesitate to reach out for a conference.

Respectfully submitted,



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